

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BRADY TUCKER, RYAN HILTON and
STANTON SMITH, Individually and On Behalf
of All Others Similarly Situated,

Plaintiffs,

v.

CHASE BANK USA, N.A.,

Defendant.

Case No. 1:18-cv-03155-KPF

**DECLARATION OF DAVID J. HARRIS, JR.
IN SUPPORT OF PLAINTIFFS' UNOPPOSED
MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

DECLARATION OF DAVID J. HARRIS, JR.

I, David J. Harris, Jr., declare as follows:

1. I am an attorney admitted to practice law in the State of California, and admitted *pro hac vice* to practice before this Court in the above-captioned Action. I am an attorney in the law firm of Finkelstein & Krinsk LLP, and lead trial counsel for Plaintiffs Brady Tucker, Ryan Hilton and Stanton Smith (“Plaintiffs”) and the putative Class. I make this declaration in support of Plaintiffs’ Unopposed Motion for Preliminary Approval of Class Action Settlement. I have personal knowledge of the matters stated herein and if called upon to do so, I could and would testify competently thereto.

2. Finkelstein & Krinsk LLP is one of the longest-tenured class action litigation firms in San Diego, having decades of experience prosecuting class actions in federal and state courts across the country. I have approximately eight years of experience dedicated to successfully prosecuting shareholder and consumer class action cases. I have obtained extensive knowledge of the facts, laws and regulations applicable to this case. I strongly support the Parties’ proposed Settlement Agreement as a fair and reasonable compromise of Plaintiffs’ and Class Members’ pending claims.

3. Attached hereto are true and correct copies of the following Exhibits:

- Exhibit A – the Parties’ proposed Settlement Agreement, dated May 22, 2020;
- Exhibit B – the Parties’ proposed Email Notice of Settlement to Class Members;
- Exhibit C – the Parties’ proposed Postcard Notice of Settlement to Class Members;
- Exhibit D – the Parties’ Proposed Long-Form Notice of Settlement to Class Members; and
- Exhibit E – the Firm Resume for Finkelstein & Krinsk LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this day of May 26, 2020, in San Diego, California.

s/ David J. Harris, Jr.
David J. Harris, Jr.